



Bureau of State Laboratory Services
Office of Laboratory Licensure, Certification & Training

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JANE DEE HULL, GOVERNOR
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DATE: May 14, 2001
TO: Laboratory Director and QA Manager
FROM: Wesley B. Press, Bureau Chief
SUBJECT: Information Update #66
NOTE: If any problems occur with this web site, please call (602) 364-0720. Thank you.

1. Effective April 23, 2001, Mr. Gary Shipley was appointed as Program Manager for both the Environmental Laboratory Licensure and Blood Alcohol programs within the Office of Laboratory Licensure, Certification and Training (OLLCT). Mr. Shipley has a B. S. degree in Physical Science from the University of Nebraska - Kearney. He has most recently been working as a Laboratory Consultant at OLLCT primarily responsible for Quality Assurance at the State Health Laboratory Chemistry section. Mr. Shipley has over 15 years of experience in environmental and industrial laboratories in both private as well as governmental facilities. Data review and QA requirements relative to compliance with many environmental methods including military and corporate specifications are his specialties.

He has operated and established training programs for many scientific instruments such as: atomic absorption (flame, furnace, & vapor generation), gas chromatography, mass spectroscopy, electron microscopy, x-ray analysis (EDX & XRF), thermal analysis (DSC), ion chromatography, etc. In his previous employment Mr. Shipley gained extensive experience in fulfilling the requirements of the following audits: environmental audits (EPA, DEQ, & Lab Licensure), military audits (Army, Navy, DOD) and customer audits (contract compliance).

2. In the past the Arizona Department of Health Services' (ADHS) rules required that environmental compliance testing be performed by methods which:
 - A. were specifically listed in our rules,
 - B. had received director approval or,
 - C. had been specifically required by the Environmental Protection Agency (EPA) or the Arizona Department of Environmental Quality (ADEQ).

As an example, item "c" above allowed laboratory licensure to accept modifications required by EPA in their "Technical Notes on Drinking Water Methods" dated October 1994. Method modifications or method revisions which are required by specific programs within ADEQ, the use of capillary columns instead of packed columns are other examples.

In our current rules item "c" above has been removed. Therefore, our office, working with Arizona's Environmental Laboratory Advisory Committee (ELAC) has been compiling a list of these method revisions and method modifications. Once this list is complete, our office will get a blanket approval from our Director. If you would like to see the draft list that was distributed at the last ELAC meeting, or if your laboratory is aware of any such modifications you would like us to include please e-mail Prabha Acharya at: pacharya@hs.state.az.us.

3. The March 2001 Labcert Bulletin from EPA's Office of Ground Water and Drinking Water (OGWDW) contained the following information:
 - A. "NELAC VI voted to allow a laboratory to use a single PT ampule for multiple methods. It is the opinion of OGWDW that if a laboratory has two methods running for a single contaminant, it is more scientifically correct to analyze one ampule by one method in the first half of the year and a second ampule by the second method in the second half of the year."

Our office requires laboratories that are running two methods for a single analyte to successfully analyze separate PT's for each licensed method. This applies to methods used to report compliance data. It does not apply to methods which are used only for confirmatory purposes.

2. Confusion Regarding the 80% Rule

Controlling 21 VOCs (volatile organic compounds) and successfully analyzing a PT (proficiency test) sample containing all VOC analytes annually is difficult. Realizing this, OGWDW allows the laboratory leeway in the analysis of the VOC PT samples. Excluding vinyl chloride, if the laboratory passes 80% of the VOC analytes, it can be certified for all of the VOCs. The 80% rule for VOCs has recently been made more difficult to interpret since some PT providers may include THMs (trihalomethanes) in the same vial as the VOCs. The 80% Rule does not apply to the THMs if they are present in the VOC ampule. Currently they must be passed as Total THMs.

In the M/DBP (microbial and disinfectants/ disinfection byproducts) rule, to become effective in January 2002, the 80% rule applies to the DBP contaminants by class. It was the intent of the rule writers that all THMs, HAA5 (haloacetic acids, 5), bromate and chlorite be successfully analyzed each year and the 80% rule would apply to each class. Since there are four THMs, missing one would mean that only 75% of the contaminants were passed, so the 80% rule cannot apply. The anions must all be successfully analyzed as they are individual contaminants. Therefore, the 80% Rule can only apply to the HAAs and four of the five HAA5s must be successfully analyzed to be certified for all of the HAA5s.

The DBP Rule also means that if a laboratory fails one THM, it cannot be certified for TTHMs. This is a change from current certification practice."

Currently laboratory licensure requires laboratories to pass all the individual THMs in order to be licensed for Total THMs.

4. If you have any questions regarding the Updates, or if you have any technical questions that need clarification, please call or send [e-mail](#) to Prabha Acharya, Program Manager, Technical Resources and Training at the Laboratory Licensure.

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